

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION**

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CASE(S)
LISTED ON THE EXHIBIT ATTACHED HERETO:

JOINT MOTION TO DISMISS CERTAIN DEFENDANTS WITH PREJUDICE

Plaintiffs in the cases listed on the attached Exhibits A-C and Defendant C. R. Bard, Inc., advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, they jointly move the court to dismiss Bard as a Defendant in these actions with prejudice, each party to bear its own costs.

The settlements in the cases listed on Exhibits A-C relate only to Defendant C.R. Bard, Inc. Because other Defendant(s) remain in the case listed on Exhibits A-C, the case should remain open and Plaintiffs will continue to prosecute their claims against any remaining defendants.

Respectfully submitted this 9th day of April, 2019.

/s/ Richard B. North, Jr.

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EXHIBIT A – KELLEY BERNHEIM & DOLINKSY

CIVIL ACTION NUMBER (listed numerically in ascending order)	Case Name
2:16-cv-02005	Loiacano, Anna and William

EXHIBIT B – NAPOLI BERN RIPKA SHKOLNIK & ASSOCIATES

CIVIL ACTION NUMBER (listed numerically in ascending order)	Case Name
2:12-cv-03045	Myers, Kathy and Richard

EXHIBIT C – LOPEZ MCHUGH

CIVIL ACTION NUMBER (listed numerically in ascending order)	Case Name
2:13-cv-22743	Wainwright, Sherrie and Tim

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of April, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Richard B. North, Jr.
Richard B. North, Jr.
Counsel for C. R. Bard, Inc.